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COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Fourteenth session,
Geneva, 8-18 December 1997,
agenda item 2 (d))

DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Other draft amendments

Damaged packagings

Transmitted by the Expert from the United Kingdom

Justification

In 1994 the International Air Transport Association (IATA) reported that a number of packages, some containing dangerous goods, had been found to be leaking on aircraft, mainly in Europe. During the Sub-Committee session in July 1994, a special working group was convened but no proposals to change the Recommendations were made at that time. During the last 3 years several further incidents have been reported and the Civil Aviation Authority in the United Kingdom arranged for some tests to be undertaken to try to identify a common cause of the problem, mainly damage to the chimbs of metal drums.

There would appear to be two causes. Firstly, consignors are not considering sufficiently the hazards that a package might encounter during transport e.g. manual handling and transhipment. Secondly maintenance of certain narrow-bodied aircraft holds, notably loose hardened metal screws in the floors together with a dragging method of loading individual drums, may be responsible for some damage. It seems that although UN packagings have been used, consignors fail to take full account of the conditions that may be encountered in transport, particularly on a long journey that may involve carriage on more than one means of transport thus increasing the potential for damage through additional loading/unloading.

More recently there have been reports of similar damage occurring in freight containers and on road vehicles. A recent letter to Hazardous Cargo Bulletin from New Zealand confirmed that this was not simply a European problem.

The expert from the United Kingdom therefore proposes that the text in the Packing Provisions in Part 4 and the Provisions Concerning Transport Operations in Part 7 are clarified and augmented to require both consignors and operators to take account of conditions likely to be encountered in transport.

Proposal

1. Amend paragraph 4.1.1.1 to read as follows:

4.1.1.1 Dangerous goods shall be packed in packagings (new, reconditioned or reused) of good quality. Packagings shall be strong enough to withstand the shocks and loadings normally encountered during transport, including trans-shipment between transport units and/or warehouses as well as any removal from a pallet or overpack for subsequent manual handling. Packagings shall be constructed and closed so as to prevent any leakage from the package as prepared for transport which might be caused under normal conditions of transport, by vibration, or by changes in temperature, humidity or pressure (resulting from altitude, for example). No harmful quantity of dangerous residue shall adhere to the outside of packages.

2 Add the following two new paragraphs to Chapter 7.1:

7.1.1.3 Dangerous goods shall be secured in the transport unit in a manner that will prevent any movement during the journey which would change the orientation of the package or cause it to be damaged.

7.1.1.4 During loading dangerous goods shall be protected from being damaged. Particular attention shall be paid to the handling of packages during their preparation for transport to the type of transport unit on which they are to be carried and to the method of loading, so that accidental damage is not caused through dragging or mishandling of the packages.